

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DISTRICT**

JP MORGAN CHASE BANK, NATIONAL )  
ASSOCIATION, )  
Plaintiff, )  
v. ) Case No. 1:19-CV-05770  
ROBERT KOWALSKI, AKA ROBERT M. )  
KOWALSKI; UNKNOWN OWNERS AND )  
NON-RECORD CLAIMANTS; CHICAGO ) 1512 W. Polk Street  
TITLE LAND TRUST COMPANY s/i/i TO ) Chicago, IL 60607  
BRIDGEVIEW BANK GROUP FKA )  
BRIDGEVIEW BANK AND TRUST COMPANY, )  
AS TRUSTEE UNDER TRUST AGREEMENT )  
DATED APRIL 24, 1993 AND KNOWN AS )  
TRUST NUMBER 1-2228; MARTHA )  
PADILLA; FEDERAL DEPOSIT INSURANCE )  
CORPORATION, AS RECEIVER FOR )  
WASHINGTON FEDERAL BANK FOR )  
SAVINGS, )  
Defendants. )

## **JOINT STATUS REPORT ON DISCOVERY**

The parties hereby jointly submit this Status Report on Discovery pursuant to Court Order.

(See Dkt. 135).

## A. PROGRESS ON DISCOVERY

1. Plaintiff JPMorgan Chase Bank, N.A. ("Chase"), Defendant Federal Deposit Insurance Corporation, as Receiver for Washington Federal Bank for Savings ("FDIC-R") and Defendant Martha Padilla ("Padilla") continue to issue and respond to written discovery requests and subpoenas pursuant to the discovery schedule and deadline for completion of fact discovery by September 30, 2021.

2. The remote deposition of William Judge was taken on July 14, 2021.

3. The FDIC has sent a subpoena to Talmer Bank that is returnable on July 23.
4. Discovery is stayed as to Third-Party Defendant First Midwest Bank. (See Dkt. 141.)

**B. PROGRESS ON SETTLEMENT DISCUSSIONS.**

There has not been any significant progress on settlement since the settlement conference on May 13, 2021.

**C. ANY OTHER ISSUES TO REPORT TO THE COURT.**

None.

**SUBMITTED JOINTLY AND BY AGREEMENT OF THE PARTIES:**

**PLAINTIFF JPMORGAN CHASE BANK,  
NATIONAL ASSOCIATION**

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**DEFENDANT FEDERAL DEPOSIT  
INSURANCE CORPORATION,  
AS RECEIVER FOR WASHINGTON  
FEDERAL BANK FOR SAVINGS**

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**DEFENDANT MARTHA PADILLA**

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**THIRD-PARTY DEFENDANT FIRST  
MIDWEST BANK**

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